

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA**

United States of America,

Plaintiff,

vs.

RANDY TATE,

Defendant.

Criminal No. 0:23-cr-00160-NEB-JFD

**OBJECTION TO
DESIGNATION OF
CASE AS COMPLEX**

Randy Tate, through his attorney, Dane DeKrey, objects to the United States's Motion to Designate Case as Complex Under The Speedy Trial Act, specifically its request to delay the production of discovery for at least 120 days.¹

Mr. Tate objects to this four-month delay for the same reasons several other defendants have objected:

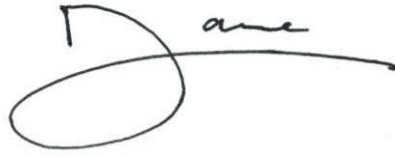
- 1) It makes it difficult for him to understand the charges against him;
- 2) It impedes defense counsel's ability to effectively represent him;
- 3) It forces him to remain in a county jail long term, which places an undue hardship on him; and
- 4) It's unrealistic that the United States has not *extensively prepared* for this case, making its claimed need for 120 additional days difficult to take seriously.

¹ District Court Docket ("DCD") 128.

For these reasons, and those identified by the various other defendants also objecting to this designation,² Randy Tate requests that the Court deny the United States's request for a 120-day extension of its discovery obligations under Rule 16.

Dated: May 10, 2023

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Dane", with a large, stylized loop at the beginning and a horizontal line extending to the right.

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² See, e.g., DCD 242, 243, 251, 253, 257, 258, 259, 261.